

February 3, 2005

Mr. Andrew Fisk, Director
Bureau of Land and Water Quality
Maine Department of Environmental Protection
17 State House Station
Augusta, ME 04333-0017

Dear Mr. Fisk:

I am Dean Gilbert, Director of the Rumford Pulp and Paperworkers' Resource Council. The PPRC represents over 300,000 union workers nation-wide and thousands of jobs on the Androscoggin River.

I would like to thank the DEP for instituting the public comment portion of this process. Many members of the PPRC, including myself, attended and spoke at both the Lewiston and Rumford meetings. I believe it's extremely important for the DEP to hear the concerns of the people that will be affected by this regulatory process. Members of the PPRC provided many comments at the public meetings, as did many concerned citizens. I think that these comments should be addressed.

As PPRC director, I would like to reiterate some of my concerns for this process. Implementation flexibility and time lines should be fair and realistic. For example, this TMDL may result in the lowest phosphorus license limits for pulp and paper mills in the entire nation. Failure to provide adequate times and flexibility to implement these limits could be another "nail in the coffin" of an already challenged industry.

Fair treatment throughout the entire watershed is critical. From paper mills to municipalities, a consistent approach to setting implementation deadlines is crucial to a fair TMDL that addresses the entire river. The mills should not be held to a different timeline than any other license holder on the river. It is also important that good performance not be penalized with lower limits, especially if only to reward those that have not performed as well with higher limits.

At the public meetings, DEP admitted that if all of the mills shut down, Gulf Island Pond would still not meet water quality standards. Also, DEP admitted that if there were no dam, there would not be any algae blooms. What will the owners of the dam be required to do as part of this process?

Parties must continue to work together to include people and jobs into the water licensing formula. Much of the public comments at both meetings expounded these concerns and need to be addressed.

Thank you,

Dean Gilbert
Director Rumford PPRC